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**From:** Donaldson, Guy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D2A0969773664CC3B6EB1208748F1A5D-DONALDSON, GUY]  
**Sent:** 12/29/2017 3:07:49 PM  
**To:** Vivian Aucoin [Vivian.Aucoin@LA.GOV]  
**CC:** Stanton, Marya [Stanton.Marya@epa.gov]; Verhalen, Frances [verhalen.frances@epa.gov]  
**Subject:** FW: EPA comments on LDEQ's Proposed Revision to Baton Rouge's 2008 Ozone Maintenance Plan to relax the RVP

Yes, should have said exceptional event for Fran. Ozone designations land generally in Mary's group.

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**From:** Stanton, Marya  
**Sent:** Thursday, December 28, 2017 4:31 PM  
**To:** Donaldson, Guy <Donaldson.Guy@epa.gov>  
**Subject:** RE: EPA comments on LDEQ's Proposed Revision to Baton Rouge's 2008 Ozone Maintenance Plan to relax the RVP

Did you mean that Fran's group has the lead on Exceptional Events?

Mary A. Stanton, Chief  
Ozone and Infrastructure Section (6MM-MB)  
EPA Region 6  
214-665-8377

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**From:** Donaldson, Guy  
**Sent:** Friday, December 22, 2017 8:27 AM  
**To:** Stanton, Marya <Stanton.Marya@epa.gov>; Vivian Aucoin <Vivian.Aucoin@LA.GOV>  
**Cc:** Feldman, Michael <Feldman.Michael@epa.gov>; Verhalen, Frances <verhalen.frances@epa.gov>; Imhoff, Robert <imhoff.robert@epa.gov>  
**Subject:** RE: EPA comments on LDEQ's Proposed Revision to Baton Rouge's 2008 Ozone Maintenance Plan to relax the RVP

Vivian,

I meant to call you yesterday but time got away from me. I wanted to follow up on our conversation on Tuesday regarding the three big projects we have going for early 2018.

- 1) Low RVP: We have started to draft our proposed approval but we have several areas that need to be filled in based on your final submission. It will be important to see a draft of your final, both so we can insure that it's what we need and speed issuance of a proposal. OTAQ is still committed to working in parallel with the Region in addressing the national rule while the Region processes the change to the maintenance plan. After you have had chance to review the written comments, there shouldn't be any surprises, I would appreciate getting a schedule for when we would see the new draft and when you would expect to provide the final SIP. You can assume that we will provide comments on the final within 5 working days.
- 2) Exceptional Event: As we discussed, the schedule for our designations anticipates that we will have any additional information from the states by February 28. You mentioned the possibility of the EPA taking an additional year for designations to allow for the exceptional event package to be developed and reviewed. That may be a possibility but I don't think we can hang our hat on that. As you know the court is asking EPA for its proposed schedule for completing designations and my understanding is that following our submission of a proposed schedule, it is likely the court will put us under a court enforced schedule. If that is case, I don't know

how much flexibility we will have. Therefore, I encourage you pull together as much information as you can to support the exceptional event and submit a package by February 28. To me that provides the possibility of three outcomes.

EPA decides it can't approve the exceptional event and goes ahead and designates later in the spring.  
EPA decides it can approve the package event based on the available information  
EPA decides it can't make a decision on the EE without more information but is able to delay a decision on the designation for Baton Rouge based on the information you have provided and the expectation more information can be developed..

If you haven't provided anything, I think the third path will be harder to defend.

- 3) St Bernard SO2: We really want to work closely with you guys to figure out how to handle the transition period and make sure the SIP has the necessary monitoring and recordkeeping. From our conversation, I understand that Venetta is making model runs. We would really like to be able to help and coordinate our efforts. As you know Bob is set up to make model runs. He has been thinking about how to solve the problem but we are handicapped because we aren't really sure what constraints the company has. I really don't think we have the time to go through the normal game of telephone (state between company, state and EPA. We would like to get everyone together on the phone, through a webinar or in Baton Rouge or all three if necessary to see if we can bring this home. Perhaps we divide and conquer with Bob doing some runs and Venetta doing some runs.

It will also be important that we develop a schedule for these activities to makes sure you can meet your March commitment to submit a SIP that addresses the transition period, limits for the hot stack and associated monitoring and recordkeeping.

I think you would agree that these are all issues that it would serve both our agencies to try to get ahead of.

I think you know this but Mary's group has the lead on low RVP, Michaels Group has the lead on St Bernard and Fran's group has the lead on designations.

Let's plan on circling up after the holidays so we can move quickly.

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**From:** Stanton, Marya

**Sent:** Thursday, December 21, 2017 4:44 PM

**To:** Vivian Aucoin <[Vivian.Aucoin@LA.GOV](mailto:Vivian.Aucoin@LA.GOV)>

**Cc:** Jacques, Wendy <[Jacques.Wendy@epa.gov](mailto:Jacques.Wendy@epa.gov)>; Young, Carl <[young.carl@epa.gov](mailto:young.carl@epa.gov)>; Donaldson, Guy <[Donaldson.Guy@epa.gov](mailto:Donaldson.Guy@epa.gov)>; Riley, Jeffrey <[Riley.Jeffrey@epa.gov](mailto:Riley.Jeffrey@epa.gov)>; Roger Gingles <[Roger.Gingles@la.gov](mailto:Roger.Gingles@la.gov)>

**Subject:** EPA comments on LDEQ's Proposed Revision to Baton Rouge's 2008 Ozone Maintenance Plan to relax the RVP

Hi Vivian,

Attached are our comments. Please let me know if you have any questions.

Thanks,

Mary A. Stanton, Chief

Ozone and Infrastructure Section (6MM-MB)

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214-665-8377

